

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**DECLARATION OF SARAH R. LONDON  
IN SUPPORT OF ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

I, Sarah R. London, declare:

1. I am an attorney in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Counsel for Uber requested that Plaintiffs' counsel preserve the confidentiality of the materials below:

Document	Description	Designating Party
Exhibit A to the Supplemental Declaration of Roopal P. Luhana in Support of Plaintiffs' Motion to Enforce PTO No. 2 and to Compel Defendants to Produce Litigation Hold and Preservation Information	List of the job titles of past and current Uber employees subject to a legal hold	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of January, 2024 in San Francisco, California.

/s/ Sarah R. London  
Sarah R. London